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Attorneys for Collective Interests of Jurors

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AMMON BUNDY, et al.,

Defendants.

Case No. 3:16-cr-00051-BR

STIPULATION

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On November 28, 2016, Oregonian Publishing Company, LLC, the Associated Press, and Oregon Public Broadcasting (the “Interested Media”) filed a Motion to Intervene, to Modify Protective Order, and For Release of Jurors’ Names. (Dkt. 1581.) On December 15, 2016, the Interested Media filed a supplemental memorandum in support of its original motion. (Dkt. 1620.) Interested Media are represented by Charles Hinkle and Brad Daniels of Stoel Rives LLP. In response to Interested Media’s motion, the Court found that “none of the parties to this

action are in a position to represent the jurors' collective interests adequately[.]” (Dkt. 1621.)

Thus, the Court appointed David Markowitz, Laura Salerno Owens, and Harry Wilson of the firm Markowitz Herbold PC to represent the “collective interests of such jurors.” (*Id.*)

Interested Media and the Collective Interest of the Jurors, through their respective counsel, stipulate as follows:

- Markowitz Herbold will forward Interested Media's requests for interviews to each of the jurors.
- Each of the jurors can decide for his or herself whether to agree to an interview and whether the interview will be anonymous.
- If a juror agrees to a non-anonymous interview, Markowitz Herbold will facilitate an exchange of contact information between Interested Media and the juror.
- If a juror agrees to an anonymous interview, Markowitz Herbold will arrange for an anonymous exchange of questions and answers along terms mutually agreed to between the Interested Media and the juror.
- Markowitz Herbold will not release any of the jurors' names or contact information without their express permission and none of the jurors are obligated to accept the request for interviews.
- The Interested Media will not file any additional motions in this matter seeking to learn the names of the jurors without first allowing Markowitz Herbold to again offer the jurors the Interested Media's interview requests along the same terms described herein.

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- As a result of this stipulation, the parties agree the Court may deny the Motion (Dkts. 1581, 1620) as moot.

DATED this 17th day of January, 2017.

IT IS SO STIPULATED:

/s/ Charles F. Hinkle
Charles F. Hinkle, OSB No. 710839
Brad S. Daniels, OSB No. 025178

Of Attorneys for Oregonian Publishing
Company, LLC, the Associated Press, and
Oregon Public Broadcasting

/s/ Laura Salerno Owens
David B. Markowitz, OSB No. 742046
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Of Attorneys for the Collective Interest of the
Jurors